

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE AMERICAN INTERNATIONAL
GROUP, INC. ERISA LITIGATION II

This Document Relates To:

All Actions

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Master File No.: 08-CV-5722 (LTS) (DCF)

**NOTICE OF MOTION BY PLAINTIFFS FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF
ALLOCATION, AND CERTIFICATION OF THE SETTLEMENT CLASS**

PLEASE TAKE NOTICE that, pursuant to this Court's June 5, 2015 Order and FED. R. Civ. P. Rules 23(h) and 54(d)(2), and based upon the accompanying Memorandum of Law and Joint Declaration of Co-Lead Class Counsel In Support of Plaintiffs' Motions (1) for Approval of Settlement and Plan of Allocation; And Certification of Settlement Class; and (2) for an Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards, dated August 11, 2015, Plaintiffs hereby move the Court, before the Honorable Laura Taylor Swain, United States District Court Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York, for entry of an Order in accordance with FED. R. Civ. P. 23(e), granting a final approval of the class action settlement and plan of allocation, and certification of the settlement class.

A copy of the Proposed Order and Final Judgment is being submitted to the Judgments Clerk pursuant to § 18.3 of this Court's Electronic Case Filing Rules and Instructions.

Dated: August 11, 2015

Respectfully submitted,

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Co-Lead Counsel

CERTIFICATE OF SERVICE

I certify that, on August 11, 2015, I electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which will send a notification to all counsel of record.

/s/ Craig Lowther

Craig Lowther